

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re  
Clara L Bowman  
Debtor

Case No 5:20-bk-01002

**MOTION OF DEBTOR TO MODIFY PLAN**

Clara L Bowman (the "Debtor"), by the Debtor's attorney, Robert Spielman, states the following:

1 The Debtor filed a petition for relief under Chapter 13, Title 11, United States Code, (the "Code")  
on March 15, 2020 (the "Filing Date").

2 A first amended plan was thereafter confirmed on August 19, 2020.

3 The confirmed plan provided for the payment of all allowed unsecured claims in full, and also for  
the curing of pre-petition arrearages owed on secured debt that encumbered her residence.

4 Because of the pandemic, the Debtor was laid off from her position at Dollar Tree in November  
2020.

5 The Debtor has subsequently returned to work, but at reduced hours.

6 The proposed second amended plan therefore provides for a suspension of plan payments for six  
months, in order to allow the Debtor to catch up on her plan payments and her other expenses.

7 The proposed amended plan does continue, however, to provide for the payment of all allowed  
unsecured claims in full, and also for the curing of pre-petition arrearage owed on the secured  
debt.

8 Separately, the Debtor is requesting relief directly from the secured lenders under the provisions  
of the CARES Act, in order to deal with post-petition arrearages that have arisen with respect to  
her direct payments to those secured lenders.

9 A temporary suspension of plan payments is therefore warranted at this time.

10 The proposed modified plan is in accord with all applicable provisions of the Code.

**WHEREFORE**, Debtor requests that the Court permit the modification of the plan,  
and that the Court grant such other relief as is just.

**LAW OFFICES OF ROBERT SPIELMAN, P.C.**

**/s/ Robert Spielman**

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Bloomsburg, Pennsylvania